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December 8, 2000

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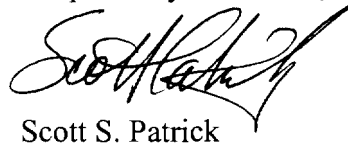
Magalie Roman Salas, Esquire  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Dear Ms. Salas:

On behalf of KTVU Partnership, licensee of KRXI(TV), Reno, Nevada, there are transmitted herewith an original and five copies of its *Petition for Rule Making* proposing the substitution of channel 10 for channel 44 as the station's paired DTV allocation.

If any additional information is needed in connection with this matter, please contact me.

Respectfully submitted,



Scott S. Patrick

Enclosure

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Before the  
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In the Matter of )  
 )  
Amendment of Section 73.622(b) ) MM Docket No. \_\_\_\_\_  
Table of Allotments, ) RM- \_\_\_\_\_  
Digital Television Broadcast Stations )  
(Reno, Nevada) )  
 )

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**PETITION FOR RULE MAKING**  
**TO AMEND THE DTV TABLE OF ALLOTMENTS**

KTVU Partnership, licensee of KRXI(TV), Reno, Nevada, by its attorneys and pursuant to Sections 1.401 and 73.622(a) of the Commission's Rules (47 C.F.R. §§1.401 and 73.622(a)), hereby respectfully petitions the Commission to institute a rulemaking to amend Section 73.622(b), the DTV Table of Allotments, by substituting channel 10 as the station's paired DTV allocation for the transition period in lieu of channel 44, as originally allotted. Specifically, the DTV Table of Allotments would be amended as follows:

	<b><u>Present</u></b>	<b><u>Proposed</u></b>
Reno, NV	13, *15, 22, 23, 26, 34, <b><u>44</u></b>	<b><u>10</u></b> , 13, *15, 22, 23, 26, 34

Issuance of a Notice of Proposed Rule Making would be consistent with the Commission's rules and policies that are designed to assist smaller market stations in recognition of the special burden that the implementation of digital television places on them – the most

prominent being the staggered DTV construction schedule.<sup>1</sup> Recognizing the intricacies of DTV operations and the need for stations to maximize service efficiently, the Commission also has promised to provide broadcasters with flexibility in developing alternate allotment proposals.<sup>2</sup>

KRXI(TV) serves the Reno DMA, ranked 111th in the United States.<sup>3</sup> As set forth in greater detail in the attached Engineering Statement, the proposed substitution of the VHF channel adjacent to the station's NTSC Channel 11 would allow KRXI to reduce the impact of DTV build-out and operating costs by permitting the sharing of certain transmission equipment and facilities. This sharing also will facilitate the anticipated transfer of digital operations to the station's traditional Channel 11 at the close of the DTV transition. Importantly, operation on the VHF channel would help overcome terrain shielding problems, ensuring effective service replication for viewers throughout the mountainous Reno DMA. Accordingly, the public interest would be served through enhanced service and more efficient use of the broadcast spectrum.

As demonstrated in the Engineering Statement, KRXI-DT's proposed service area encompasses the community of license as required,<sup>4</sup> and the proposed allotment parameters conform with the Commission's *de minimis* interference standard.<sup>5</sup>

For the reasons set forth above, KTVU Partnership respectfully requests that the Commission initiate a rule making proceeding to amend Section 73.622(b) of its Rules to substitute channel 10 for channel 44 for use by KRXI-DT in Reno, Nevada. The amendment

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<sup>1</sup> Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, *Fifth Report and Order*, MM Docket 87-268, 12 FCC Rcd 12809, ¶78 (1997).

<sup>2</sup> Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, *Sixth Report and Order*, MM Docket 87-268, 12 FCC Rcd 14588, ¶172 (1997).

<sup>3</sup> Broadcasting & Cable Yearbook 2000, B-220 (2000).


<sup>4</sup> 47 C.F.R. §73.623(c)(1).

<sup>5</sup> 47 C.F.R. §73.623(c)(2).

would serve the public interest because the proposed change would enable KRXI to provide better coverage and would result in a more efficient use of the broadcast spectrum.

Respectfully submitted,

KTVU PARTNERSHIP

By:   
Kevin F. Reed  
Scott S. Patrick

Its Attorneys

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Suite 800  
Washington, D.C. 20036-6802  
(202) 776-2000

Dated: December 8, 2000

**ATTACHMENT**

**Engineering Statement**

**ENGINEERING EXHIBIT  
IN SUPPORT OF A  
PETITION FOR RULE MAKING  
AMENDMENT OF SECTION 73.622(b),  
TABLE OF ALLOTMENTS  
DIGITAL TELEVISION BROADCAST STATIONS  
KTVU PARTNERSHIP  
STATION KRXI-DT  
RENO, NEVADA**

**ENGINEERING STATEMENT**

The engineering exhibit of which this statement is part was prepared in accordance with Section 73.623(c) of the FCC Rules on behalf of KTVU Partnership (hereinafter KTVU) to request the substitution of digital television (DTV) channel 10 (192-198 megahertz (MHz)) for DTV channel 44 (650-656 MHz) at Reno, Nevada, for use by its station KRXI-DT. KRXI-TV, Reno, Nevada, is licensed to operate on NTSC channel 11 (198-204 MHz), and Table 1, *DTV Allotments, Assignment Pairings with Analog Stations, and Service Replication and Interference Evaluation*, of the *Sixth Report and Order* in MM Docket Number 87-268, as revised, pairs DTV channel 44 with the existing KRXI-TV NTSC channel 11 assignment. The reference facilities for DTV operation on channel 44 at Reno are 525.4 kilowatts (kW) effective radiated power (ERP) and 856 meters antenna radiation center height above

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Engineering Exhibit  
Petition for Rule Making  
KRXI-DT, Reno, Nevada

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average terrain (HAAT). The reference coordinates for the DTV channel 44 allotment at Reno based on the 1927 North American Datum (NAD 27) are:

39° 35' 25" North Latitude

119° 55' 40" West Longitude.

KTVU believes that a high-band VHF DTV operation will provide better service to the public than a UHF DTV operation because of the harsh terrain surrounding Reno. VHF construction and operating costs are significantly less than UHF costs, and, because KRXI-DT expects to revert to channel 11, the current KRXI-TV NTSC channel assignment, at the end of the transition period, the transmission equipment installed for DTV operation on channel 10 could be converted readily to operation on DTV channel 11, whereas a UHF DTV transmission system would be abandoned.

KTVU requests reference facilities of 16.8 kW ERP and 856 meters antenna radiation center HAAT for DTV channel 10 at Reno. The proposed reference coordinates (NAD 27) for DTV channel 10 at Reno are:

39° 35' 23" North Latitude

119° 55' 37" West Longitude.

The substitution of DTV channel 10 for DTV channel 44 at Reno complies with the principal community coverage requirements of Section 73.625(a) of the FCC Rules and the interference limits set forth in Section 73.623(c)(2) of the FCC Rules.

Figure 1, Sheet 1, of this exhibit is a portion of the National Atlas Central Pacific States 1:2,000,000 Series USGS map showing the location of the 36 dB $\mu$  F(50,90) coverage contour for the operation of KRXI-DT on DTV channel 10 at the proposed allotment reference point with the proposed allotment reference facilities of 16.8 kW ERP and 856 meters antenna radiation center HAAT. Figure 1 shows that all of Reno, Nevada, is enclosed by the proposed KRXI-DT principal community coverage contour as required by the FCC Rules.

Studies made using the FCC's FORTRAN Longley-Rice (FLR) model show that no more than *de minimis* changes in the existing interference predicted to other stations, assignments, or allotments will arise from the use of DTV channel 10 at Reno as is proposed herein. Thus, this proposal comports with the technical requirements of Section 73.623 of the



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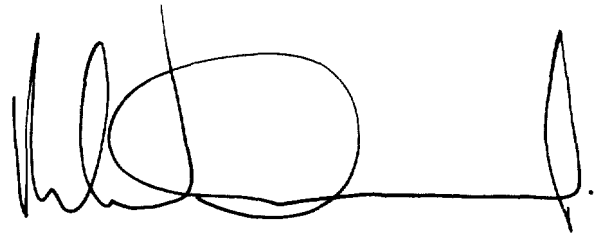
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Engineering Exhibit  
Petition for Rule Making  
KRXI-DT, Reno, Nevada

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FCC Rules. A tabulation of the stations effected by this proposal is included as Figure 2 of this exhibit.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 6, 2000.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke ending in a vertical line.

Robert W. Denny, Jr., P.E.

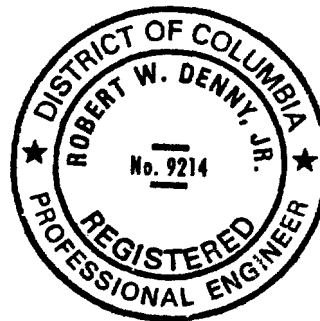
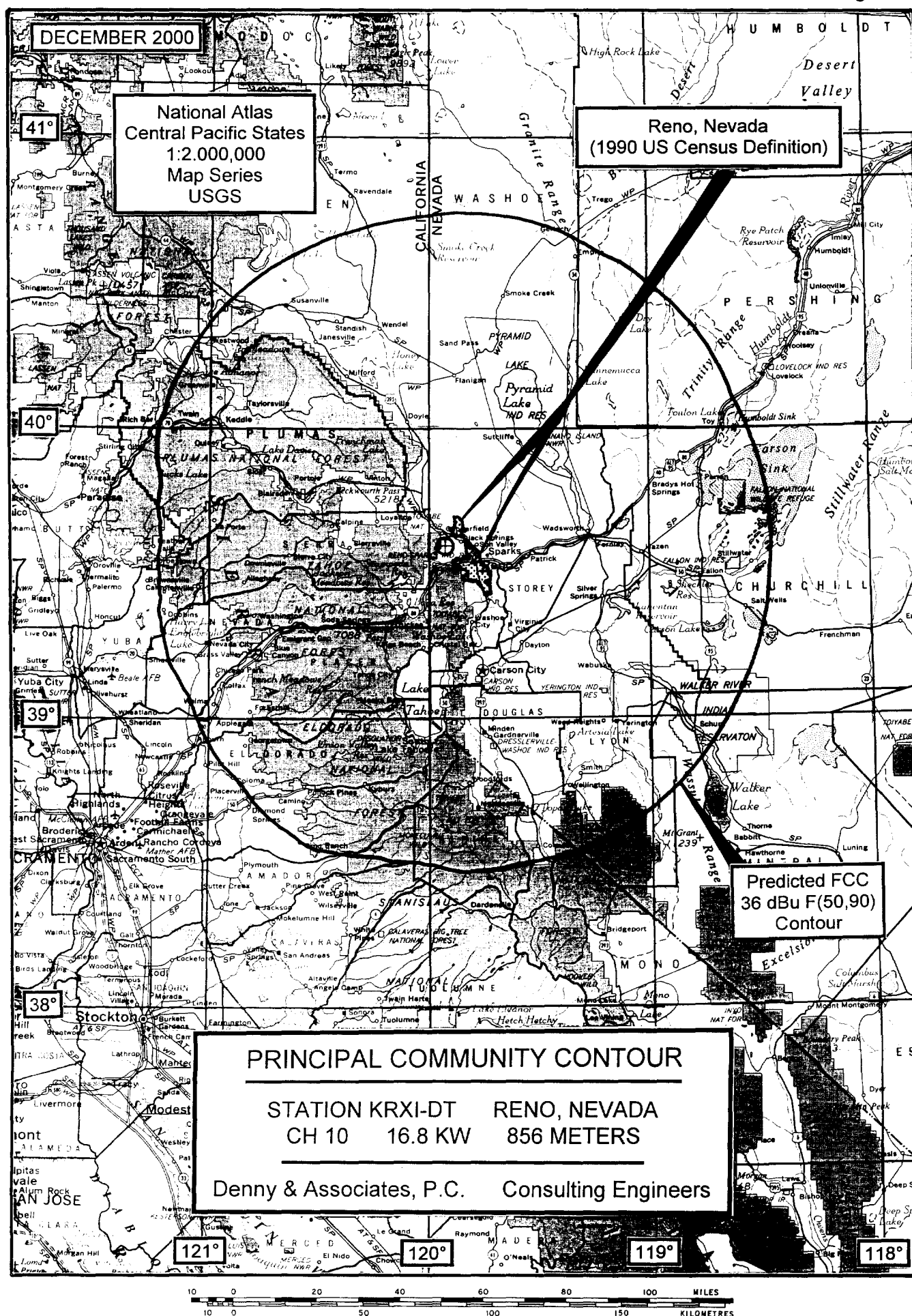


Figure 1



## INTERFERENCE STUDY

**STATION KRXI-DT    RENO, NEVADA**  
**CH 10                    16.8 KW (MAX-BT)                    856 METERS**

### De Minimis Interference Study

Station	Existing NTSC service	DTV Service During Transition	NTSC Service Population Replicated By DTV Service	Existing Percentage DTV Interference	Proposed New DTV Interference	Interference Increase	New population served	New Percent Loss
NTSC	(Persons)	(Persons)	(Percent)	(Percent)	(Persons)	(Percent)	(Persons)	(Percent)
KXTV-TV, Sacramento, CA(lic) Ch. 10, 316 kW, 595 m	4,047,000	N/A	N/A	0.2	6,329	0.2	4,040,671	0.4
KXTV-TV, Sacramento, CA(cp) Ch. 10, 316 kW, 595 m	3,897,166	N/A	N/A	0.3	6,251	0.2	3,890,915	0.5
KTVL-TV, Medford, OR Ch. 10, 132 kW, 1009 m	277,000	N/A	N/A	0.0	36	0.0	276,964	0.0
DTV								
KRNV-DT, Reno, NV (PRM) Ch. 9, 16.8 kW, 857 m	393,000	476,096	121.1	0.0	7,249	1.8	468,847	1.8
KSBW-DT, Salinas, CA (PRM) Ch. 10, 24.2 kW, 692 m	2,944,000	674,803	22.9	4.2	0	0.0	674,803	4.2